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April 19, 1999 0296 '99 APR 26 AIO:37

William K. Hubbard
Dockets Management Branch (HFA-305)
Food and Drug Administration
5630 Fishers Lane, Rm. 1061
Rockville, MD 20852

Re: Unnecessary regulation: Performance Standard for *Vibrio vulnificus*
Docket Number 98P-0504 -- Volume 64, Number 13, Page 3300-3301

Dear Mr. Hubbard,

The FDA has requested comments on eight points of interest in regards to issues raised by a petition submitted by Center for Science in the Public Interest.

I am a public health physician with 30 years in public service. Also, I served on the board of directors of a mariculture corporation more than two decades. I am aware of the problems and consequences about which we speak here.

The Center for Science in the Public Interest advocates pasteurization and killing an organism usually sold alive to preserve freshness and flavor before consumption alive or cooked. The target, *Vibrio vulnificus*, is a rare agent of illness except in warm waters where it may infrequently cause illness in some circumstances.

This remedy is extreme and unnecessary. Public Health agencies and the shellfish industry folks already expend great effort to monitor for and protect us from *V. parahaemolyticus* and a host of other more serious threats to shellfish lover's health. The Interstate Shellfish Sanitation Conference unites science and industry and appears ready and capable of assuring the needed protections we shellfish consumers may reasonably demand. This organization might save you a whole lot of unnecessary hassle of an already beleaguered industry.

Where you must draw the line on safety and quality is always an arbitrary one. The logic employed by the Center for Science in the Public Interest also demands pasteurization of lettuce and eggs and hamburger and a host of other potentially dangerous foodstuffs I find in kitchens.

Knowledge of the relative risks saves us. Half shell oyster consumers should know the origin and certification of their shellfish. Sterilizing shellfish is not more necessary than sterilizing lettuce and eggs and hamburger.

Thank you,

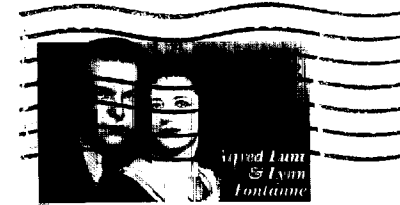


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98P-0504

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